## **REVIEW OF THE GREATER SYDNEY PARKLANDS TRUST ACT 2022**

**Organisation:** Friends of Fernhill and Mulgoa Valley Inc

**Date Received:** 31 January 2025



## FRIENDS OF FERNHILL AND MULGOA VALLEY INC. (FFMV)



Our goals are to "safeguard Fernhill Estate and ensure protection, through legislation, of the Mulgoa Valley as an area of outstanding cultural and natural significance to NSW".

# FFMV Response to the Review of the Greater Sydney Parklands Trust Act 2022

Friends of Fernhill and Mulgoa Valley Inc, a signatory to the Alliance for Public Parklands, endorse the Objects to conserve the natural and cultural heritage values and protection of the environment within Sydney's parklands.

The following are our recommendations for improving the Greater Sydney Parklands Trust Act and our assessment of how effective the terms of the Act are in achieving the Objects of the Act, with special reference to Fernhill Estate.

**Recommendations for Improving the Greater Sydney Parklands Trust Act** 

**Object (a):** to maintain and improve the parklands estate across Greater Sydney and ensure the parklands estate is effectively managed and operated to deliver world-class and ecologically sustainable parklands for the public,

## **Recommendations:**

- 1. Functions for this object should include:
  - encourage ecologically sustainable development by ensuring that **all development has minimal adverse environmental impact.**<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Sydney Regional Environmental Plan No 31—Regional Parklands Part 2 7 General development controls - has an objective *not present in the GSPT Act*: (d) encourage ecologically sustainable development by ensuring that **all development has minimal adverse environmental impact** 

- "safeguard historic urban public parks as heritage places created or adapted for the use and enjoyment of present and future generations".<sup>2</sup>
  - The sustainable development and management of Fernhill Estate must be underpinned by conserving and enhancing its outstanding historic designed landscape, architectural heritage and unique Cumberland Plain vegetation.
- 2. A framework is required in each park's Plan of Management and Landscape Master Plan to explain how an ecologically sustainable parkland will be achieved and should include:
  - · adaptive reuse of a building or structure consistent with the conservation of the natural and cultural values of the land, and compatible with the retention of the cultural (and heritage) significance of the building or structure.
  - · provision for sustainable visitor use and enjoyment that is compatible with the conservation of the site's natural and cultural values (carrying capacity)
  - $\cdot$  environmental protections that acknowledge the critical natural habitat for plants and animals within the parklands.

## **Comments:**

- a. The Fernhill Plan of Management and Landscape Master Plan do not explain how Fernhill will achieve ecological sustainability. Fernhill Landscape Master Plan to 2026 does not consider Fernhill Estate in its entirety.
- b. The provision of sewer and water infrastructure at Fernhill Estate must be given careful planning to avoid biobanked and Aboriginal and colonial archaeological sites and disruption to the scenic and aesthetic qualities of Fernhill.
- c. Fernhill has the unique opportunity to be a world leader in gold standard sustainability through installing on-site solar, self-sufficiency in water; energy efficiency upgrades for buildings/public lighting; on-site waste-water treatment for Fernhill's own operations; an electric fleet of vehicles for transport around the site; environmentally friendly grass protector grids for parking lots and paths if grass swards are not used; waste reduction strategy for green waste; "dark sky" management of lighting<sup>3</sup>, etc.

The Burra Charter advocates a cautious approach – "do as much as necessary to care for the place and to make it usable but otherwise change it as little as possible so that its cultural significance is retained". This approach is compatible with high-quality design.

https://www.icomos.org/images/DOCUMENTS/Charters/GA2017 6-3-2 HistoricUrbanPublicParks EN adopted-15122017.pdf; Brown S. 2019. Historic urban public parks: are they being incrementally spoiled? https://www.thenatureofcities.com/2019/02/21/historic-urban-public-parks-incrementally-spoiled/#:~:text=On%2029%20October%202013%2C%20the%20ISCCL%20Annual%20Meeting,had%20been%20a%20long%20time%20in%20the%20making

<sup>&</sup>lt;sup>2</sup> ICOMOS-IFLA DOCUMENT ON HISTORIC URBAN PUBLIC PARKS

<sup>&</sup>lt;sup>3</sup> https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/dark-sky-planning-guideline-2016-06.pdf

**Object (c):** to ensure the conservation of the natural and cultural heritage values of the parklands estate and the protection of the environment within the parklands estate,

**Recommendation:** That the defining <u>rural</u> characteristic of Fernhill Estate is emphasised, both for its centrality to the established heritage significance of the site and for its future recreational and educational utility as rural farmland in an increasingly urbanised landscape.

**Background**: Fernhill is an outstanding and increasingly rare example of an Australian rural colonial landscape, especially in the Sydney Basin. Its rural character is a defining feature of the historic setting of both Fernhill House and its associated Landscape Garden. The significance of this rural character is clearly articulated in the State Heritage Register listing for the place:

"The estate is primarily significant for its landscape which is a rare Australian example of the English landscape school's practice of modifying the natural landscape to create a romanticised natural appearance embellished by a richness of cultural features... [t]he estate also demonstrates a unique phase in Australia's history with the rise of the landed pastoral estates."

As urban development in the Sydney basin has increased, the rural landscape that once characterised the basin has becoming increasingly rare, and within Fernhill itself there has been a gradual reduction of the rural land as bushland has been reinstated

The National Trust is concerned that the importance of the rural colonial landscape in defining the heritage character of Fernhill Estate has not been adequately recognised and accommodated for in the current Fernhill Landscape Masterplan to 2026. 4

**Object (d):** to advocate for a long-term vision to achieve the outcome of quality parklands across Greater Sydney, particularly connectivity of green corridors and public access to open space,

#### **Recommendations:**

1. The legislation must anticipate more parks will be added to the Greater Sydney Parklands.

2. The Act is not explicit enough: a more holistic approach to urban green space provision is needed.

<sup>&</sup>lt;sup>4</sup> https://www.nationaltrust.org.au/blog/fernhill-estate-mulgoa-draft-landscape-masterplan/

### **Comments:**

a. Under the Greater Sydney Parklands Trust, there is a provision (section 12) for a committee, known as the Blue- Green grid committee, to advocate for a longterm vision for and outcome of quality parklands across Greater Sydney, particularly connectivity of green corridors and public access to open space'. Urban green space governance tools (such as legislation, policies, plans, strategies and budgets) should be coordinated, developed and implemented at all levels of government, to provide equitable access to urban green space, commensurate with current and future needs.

A recent article in Landscape Architecture Australia<sup>5</sup> described crucial factors that shape urban green space and are applicable to this discussion of the Act:

- Urban green space governance tools (such as legislation, policies, plans, strategies and budgets) should be coordinated, developed and implemented at all levels of government, to provide equitable access to urban green space, commensurate with current and future needs
- A holistic approach to urban green space provision
- City leaders must provide vision and leadership, foster collaboration to provide innovative and sustainable solutions for delivery of urban green space
- Optimize existing land resources to sustainably support the broad spectrum of urban green space functions
- Engage with community partners
- Conceived and delivered in a manner economically, environmentally and socially sustainable
- Supported by individuals with relevant knowledge, skills and experience.
- b. More housing developments require more parks (large and small) and more green belts or corridors.

Western Sydney residents encounter a range of obstacles to engaging in physical activity. Socio-economic factors, cultural and linguistic barriers, inadequate infrastructure including limited transport connectivity and heat vulnerability all contribute to lower participation rates, particularly in low-income areas. Addressing these barriers requires coordinated, place-based strategies to foster

<sup>&</sup>lt;sup>5</sup> Chris Boulton "Rethinking our approach to urban green space provision Landscape Architecture Australia, August 2021 https://landscapeaustralia.com/articles/rethinking-our-approach-to-urban-green-space-provision/

equitable access to recreational opportunities and support healthy, active communities.<sup>6</sup>

**Function 15 (f):** to facilitate the use of the parklands estate to meet community health needs and provide opportunities for, and encourage, activities that promote health and well-being in the community,

**Recommendation:** Western Sydney has an especial need for more easily accessible open space and parklands.

**<u>Background</u>**: The importance of quality public open space is more important than ever in Western Sydney:

- a. Western Sydney houses 47% of Sydney's total population (2.12 million).<sup>7</sup>
  According to Department of Planning & Environment projections, the Western Sydney population is expected to reach 2.92 million in 2031, growing at an average annual rate of 1.90%.<sup>8</sup>
- b. A study by western Sydney University in 2019/20 documented air temperatures above 50°C for the first time in the Sydney Basin on three individual days in December, January and February. These observations are evidence for a situation where super-heated air impacts not a single location or suburb, but a wider section of Western Sydney.<sup>9</sup>
- c. Fernhill Estate will be ideally suited as a passive park for health and wellbeing, especially for elderly and families with small children.

**Object (e):** to encourage the use and enjoyment of the parklands estate by the community by promoting and increasing the recreational, historical, scientific, educational, cultural and environmental values of lands within the parklands estate,

**Object (f):** to ensure the parklands estate may be used by the community in a way that is adaptive and recognises and responds to the diverse needs of the community,

**Recommendation:** Recognise the unique characteristics of each park - One model does not fit all!

admin.westernsydney.edu.au/ws/portalfiles/portal/130715167/Tackling Inactivity CfWS Digital.pdf

<sup>6</sup> https://researchers-

<sup>&</sup>lt;sup>7</sup> https://www.parliament.nsw.gov.au/researchpapers/Pages/western-sydney-an-economic-profile\_1.aspx

<sup>&</sup>lt;sup>8</sup> https://www.parliament.nsw.gov.au/researchpapers/Documents/western-sydney-an-economic-profile\_1/Western%20Sydney%20-%20an%20economic%20profile.pdf

<sup>&</sup>lt;sup>9</sup> Pfautsch, S., Wujeska-Klause, A. and Rouillard, S., 2020. Benchmarking Summer Heat Across Penrith, New South Wales. <a href="https://researchdirect.westernsydney.edu.au/islandora/object/uws:57237/datastream/PDF/view">https://researchdirect.westernsydney.edu.au/islandora/object/uws:57237/datastream/PDF/view</a>

Background: Objects (e) and (f) of the Act do not recognise the uniqueness of each park. Despite their differences in scale, nature, users, resources and carrying capacity each park is expected to deliver the same core propositions.

This failure to recognise the uniqueness of each park, is exacerbated by Object (f) "recognise and responds to the diverse needs of the community" which infers that if the community thinks it wants another football stadium or water park or outdoor concert it could be sited in any park despite natural and cultural heritage limitations.

Plans of Management fail to indicate limitations on the scale of major activities, e.g. Fernhill Plan of Management indicates that picnic races and concerts are possible in certain precincts but give no clarity on the size of events that is permissible.

**Object (g):** to provide increased opportunity for community engagement to shape regionally significant parklands in response to diverse community needs.

Division 1 Section 15 General Functions (g): to consult with, and involve, the community in planning for the parklands estate and carrying out the plans, including the provision of services and facilities within the parklands estate, by establishing a transparent process for consultation about and management of the parklands estate,

**Recommendation:** Community consultation requires the public be informed of constraints that apply to each park.

## **Comments:**

- a. Community consultation should be informed by sound, factual background information enabling participants to understand the issues. 10 The community consultation process for Fernhill has been highly unsatisfactory. Community knowledge of Fernhill must be refined by better consultation methods. There is a feeling in the community, reinforced by such "consultation" as the Options Paper and the community open day held on 1 May 2021 by Elton Consulting at Fernhill Estate, that Fernhill is terra nullius – a large area of land without claims on it, suitable for the accommodation of all manner of activities, without respect for the prior natural and cultural heritage claims on the site. It is a greatly misleading consultation process to present "options" and "uses" for community comment without informing the community of the constraints that apply to the site.
- b. The general public is able to visit Fernhill's "walking trail" on Sundays, but without any explanatory information provided. However FFMV is pleased to see

https://www.transport.nsw.gov.au/system/files/media/documents/2022/White-Paper-Parklands-for-People-What-we-heard-report.pdf

<sup>&</sup>lt;sup>10</sup> White Paper – Parklands for People – What we heard report.

- Fernhill guided tours have now been implemented one day monthly (\$30pp) to explain "Fernhill Estate's fascinating history and heritage and unique natural environment".
- c. The proposed change to the existing planning framework or consent authority for Fernhill Estate through the EIE Improving Planning Processes to Deliver Infrastructure Faster further undermines the community consultation process by removing Fernhill from the Council's development application process and limits the public's ability to comment on proposed developments.

**Function (h):** to consult with community trustee boards about any advice received from the boards about the parklands estate or parts of the parklands estate,

Membership 38 (4) In recommending persons for appointment as members of a community trustee board, the Trust-

- (a) must be satisfied—
- (i) the person has sound knowledge of the relevant parkland including the activities carried out in the parkland, and
- (ii) the person is able to communicate effectively with local residents, local community groups and other persons who use the relevant parkland, and
- (iii) the overall membership of the board will be reflective of the broad range of views and interests of the community and persons who use the relevant parkland, and
- (b) must have regard to the need for the board to—
- (iii) include a representative who has experience or skills in heritage or heritage management.

## Recommendations:

- 1. A communication mechanism between the public and each CTB should be required.
- 2. The required skills and experience of CTB members should be closely adhered to with respect to heritage and environment.

## **Comments:**

- a. There is a critical need to include representatives on the Fernhill Estate CTB with qualifications and skills relative to the site, i.e. heritage, independent environmental, ecological and/or biodiversity.
- b. In neither the GSPT Act Division 2 Community Trustee Boards nor the Consultation and Engagement Framework 2023, is there an established direct communication Framework between the Community Trustee Boards and the general public. Ie How can anyone contact the Fernhill CTB? The website for this purpose mentioned in the consultation framework webinar did not materialise.

## 15 Functions—generally

- (1) (a) to conserve, restore, enhance and ensure no reduction in the extent of the net existing natural environment of the parklands estate,
  - (l) to undertake or facilitate business activities and the provision of facilities within the GSPT estate, but only for the following purposes—
    - (i) to maintain and improve the parklands estate across Greater Sydney,
- (ii) to ensure the parklands estate is effectively managed and operated to deliver high quality and ecologically sustainable parklands for the public,
- (o) to provide financial and operational management in relation to the GSPT estate, including maintaining the estate and other Trust assets,

### Recommendations:

- 1. Business hubs should be covered in a special section within Part 3 Functions of
- 2. Equitable distribution among parklands of income generated from business hubs.
- 3. The Act should require financial data provided in annual reports to show how much business and tourism hubs earn GSPT annually.
- 4. GSPT should publish a consolidated Annual Financial Report.

#### **Comments:**

- a. Greater Sydney Parklands Trust is faced with inadequate funding from government, and this has led to over commercialisation, e.g. business hubs in Western Sydney Parklands.
- b. Business hubs allowed on the perimeter of the Western Sydney Parklands are of concern for many in Western Sydney, as the area is much greater than the 2% specified in the Western Sydney Parklands Act.<sup>11</sup>
- c. "Park and recreation administrators who wish to expand their funding beyond existing tax support should take actions to foster trust and commitment across their multiple constituent groups". 12
- d. "Any comprehensive system of parks has three income classes of properties: a) those that can never generate income in excess of costs; b) those with a profit potential; and c) those with a profit history". Have alternate methods of paying for parks been considered? Have alternate methods of paying for parks been considered?
- e. The August 2024 summary report for Fernhill Estate Community Trustee Board states that a market sounding analysis will be conducted to explore leasing

<sup>11</sup> https://www.westernsydneyparklands.com.au/about-us/our-organisation/business/business-hubs/

<sup>&</sup>lt;sup>12</sup> Mowen, A.J., Kyle, G.T., Borrie, W.T. and Graefe, A.R., 2006. Public response to park and recreation funding and cost saving strategies: the role of organizational trust and commitment. *Journal of Park & Recreation Administration*, 24(3).

<sup>&</sup>lt;sup>13</sup> Paying for Parks: Eight models for funding urban green spaces – The Parks Alliance

<sup>&</sup>lt;sup>14</sup> Paying for Parks: Eight models for funding urban green spaces – The Parks Alliance

- opportunities for Fernhill Estate. Will alternative sources of funding be considered?
- f. GSPT Act 2022 does not address business hubs 'on' or 'off-park'. Off-park business hubs are described in the Greater Sydney Parklands Corporate Plan 2023-2028: We will look to extend our partnerships with a model that also allows sustainable long-term funding (both capital and operational expenditure) to ensure the ongoing sustainability of our parklands. Off-park business hubs – like those already in place on-park at Western Sydney Parklands – will enable us to generate revenue to support the capital and operational funding deficit for Parramatta Park, Callan Park and Fernhill Estate, and any future parklands. By having business hubs outside of existing parks, we can continue to protect the landscape and heritage values of our parks, while also allowing us to build partnerships with businesses and broader communities. 15
- g. It has not been explained how the proposed system of revenue raising through "private subsidiaries corporations, joint ventures etc" (Act Clause 11 (b) and (c)) with "the funds of each trust be spent on implementing their plan of management and ensuring they are financially sustainable" can work where the potential for revenue raising varies so greatly between parks. Will funding provided by these off-park business hubs go into a central GSPT fund, equitably available to all parks?
- h. Cross-subsidisation among parklands should be considered as occurs between Western Sydney Parklands and Fernhill Estate. (NB Fernhill Estate is governed by the Western Sydney Parklands Act 2006<sup>16</sup>).
- i. GSPT is not preparing a consolidated Annual Financial Report but combining partial information relating to GSPT in Annual Financial Reports of Centennial Park and Moore Park Trust, Parramatta Park Trust and Western Sydney Parklands Trust. This is creating unnecessary confusion and lack of transparency.
- j. Combined with the Parklands tourism hubs, the business hubs are estimated to attract almost \$800 million in capital investment and by 2030, they will have created 8,800 jobs for western Sydney. An additional \$313 to \$470 million in economic activity (gross regional product) per annum is forecast. 17 WSPT has quoted a figure for capital Investment, jobs created and economic activity, but the leasing revenue from tourism hubs and business hubs has not been cited.
- k. The 2023-2024 FY Year in Review states "\$90 million was invested into the parklands estate for capital works, park improvements, programs and operational excellence". Where in the annual reports can this information be found? The Act should require financial data to be provided in annual reports to show how much business and tourism hubs earn GSPT annually.

<sup>&</sup>lt;sup>15</sup> https://www.greatersydneyparklands.nsw.gov.au/sites/default/files/2024-01/greater-sydney-parklandscorporate-plan-2023-2028.pdf p. 25

<sup>16</sup> https://legislation.nsw.gov.au/view/html/inforce/current/act-2006-092#sec.39

<sup>&</sup>lt;sup>17</sup> https://www.westernsydneyparklands.com.au/about-us/our-organisation/business/business-hubs/

- l. Sydney population growth and increased demand and supply of housing will generate a need for more Parklands and Open Spaces in the future. The GSPT should limit the area Business Hubs take from the Parkland's land holdings and look at alternative funding models.<sup>18</sup>
- m. Specific considerations are required for Fernhill Estate, including the development of a long-term funding strategy, recognising that Fernhill is to be a park for passive recreation and robust protections are required to balance increased public use with the preservation of its unique and exceptional scenic, heritage and biodiversity values.
- n. The Fernhill Landscape Master Plan to 2026 stated that "Fernhill Estate will become a vibrant parkland opening its doors to diverse activities from walking, picnics, programs and events, and other community activities". Unfortunately with the withdrawal of the \$26 million West Connex funding, the only community activity on Fernhill is the 2.6 km walking trail only available on Sundays. Without any source of funding of its own, it has been advantageous for Fernhill to be part of Western Sydney Parklands to obtain limited funding for maintenance.

**Division 2 Functions about land. 21 (1):** The Trust may grant a lease, licence or easement over land within the GSPT estate if the lease, licence or easement—

- (a) is consistent with the objects of this Act, and
- (b) will not reduce the extent of the net existing natural environment of the GSPT estate.

#### **Recommendations:**

- 1. Define in Schedule 4. Dictionary the term "disposal" (Division 2 Functions about land Section 23) to differentiate disposal from long term leases.
- 2. Ensure individual parklands do not lose their critical habitat and cultural landscape through the granting of leases or easement.

**Comment:** The Fernhill Landscape Master Plan to 2026 proposes "creating a woodland" playground near Mulgoa Public School and a safer pick-up and drop-off zone for parents and students, working in consultation with Transport for NSW". This action would contradict GSPT Act 21.1b, as it will result in a net loss of natural environment of Fernhill Estate. The proposed area is an Aboriginal archaeological site<sup>19</sup>, Swift Parrot and Regent Honeyeater habitat and such development will compromise the important sightline between Mulgoa Road and Fernhill House.<sup>20</sup>

<sup>18</sup> https://cityparksalliance.org/wp-content/uploads/2023/11/Fundamentals-of-Funding.pdf

<sup>&</sup>lt;sup>19</sup> Austral Archaeology. 2013. Proposed residential subdivision, Fernhill Estate, Mulgoa, NSW Aboriginal archaeological report pp.24 and 28.

 $<sup>^{20}</sup>$  The Penrith City Council Draft Scenic and Cultural Landscape Study (2019) $^{20}$  stated: "There are views across the eastern precinct of Fernhill from Mulgoa Road of its rural setting. This rural character is important to the rural landscape setting of Mulgoa and the road approach to the village along Mulgoa Road".

## Division 3 Planning. 24 (3) (a): the plan includes the following—

- (i) information about the strategic direction for the management of the park to which the plan relates,
- (ii) the activities and uses of land permitted in the park to which the plan relates,
- (iii) the maximum amount of land to be used for each activity and use of land permitted in the park to which the plan relates,
- (iv) principles that will be applied in deciding whether a proposed lease, licence or easement over land within the park to which the plan relates is consistent with the objects of this Act,

### **Comments:**

- a. Activities in the Fernhill Plan of Management and its Landscape Master Plan were described but the reasons for adopting them were not explained: what was proposed, not why. This left the impression that proposals were made with inadequate, or no, analysis. That major works should have been suggested without reference to, or their substantiation through, the Fernhill draft Conservation Management Plan and the State Heritage Conservation Order is of particular concern.
- b. Two overriding principles of how the estate should be developed remain unresolved:
  - i. The use of areas of most sensitive biodiversity, areas of most or least sensitive native habitat, the extent of useable farmland and its maintenance, the extent of passive and active recreation areas, etc.
  - ii. The accessing of the site by visitors the extent of public access, carrying capacity and the means and extent of visitor access pedestrian and vehicular.
- c. Both Fernhill Plan of Management and Landscape Master Plan require complete revision.

https://www.penrithcity.nsw.gov.au/images/documents/council/council-business/Enclosure 1 to Item 5-Penrith Rural Lands Strategy Aug 2022 Post Exhibition.pdf **25 (1):** Government sector agencies to consult with Trust about planning and development that will impact on parklands estate

(1) The Greater Sydney Commission must, in exercising its function to lead metropolitan planning for Greater Sydney

**Recommendation:** Remove the reference to Greater Sydney Commission which no longer exists.

## Division 3 Planning. 26. Overshadowing

**Recommendation:** Insert a requirement for sightlines, views and vistas to, from and within parks.

## **Comments:**

a. The GSPT Act includes overshadowing but makes no mention of the importance of maintaining sightlines<sup>21</sup>, views and vistas to, from and within parks.

As the Heritage Council has said, sight lines are often 'integral to the understanding and appreciation' of heritage locations'. 'Many heritage items are deliberately designed and strategically located to be seen and appreciated from important public places. Other heritage items are significant for their visual relationship with ...natural features, events, or other heritage items. Any major project that intrudes on these sight lines presents challenges for sustaining the historic significance'.<sup>22</sup>

b. Greater Sydney Parklands (GSP) should be guided by ICOMOS-IFLA DOCUMENT ON HISTORIC URBAN PUBLIC PARKS<sup>23</sup> which emphasises, and provides guidance on, the safeguarding of historic urban public parks as heritage places created or adapted for the use and enjoyment of present and future generations; for example, "Historic vistas, views, and viewpoints are to be preserved; the planting of new vegetation, as well as siting or re-siting of elements outside parks, such as built forms, art works, water features, or commemorations, must not interfere with them".

## **Concluding Remarks**

FFMV endorses the Objects of the Act to conserve the natural and cultural heritage values and protection of the environment within Sydney's parklands.

https://www.icomos.org/images/DOCUMENTS/Charters/GA2017\_6-3-2\_HistoricUrbanPublicParks\_EN\_adopted\_15122017.pdf; Brown S. 2019. Historic urban public parks: are they being incrementally spoiled? https://www.thenatureofcities.com/2019/02/21/historic-urban-public-parks-incrementally-spoiled/#:~:text=On%2029%20October%202013%2C%20the%20ISCCL%20Annual%20Meeting,had%20been%20a%20long%20time%20in%20the%20making.

<sup>&</sup>lt;sup>21</sup> 0003 Heritage Council of NSW.pdf

<sup>&</sup>lt;sup>22</sup> 0003 Heritage Council of NSW.pdf

<sup>&</sup>lt;sup>23</sup> ICOMOS-IFLA DOCUMENT ON HISTORIC URBAN PUBLIC PARKS

Certain functions and terms of the Act could be improved for transparency and effectiveness, as outlined in this submission.

FFMV Inc would like to invite the Senate Review Committee to Mulgoa to view and discuss Fernhill Estate, its relationship to Mulgoa Valley and how the Act impacts Fernhill Estate.

Submitted on behalf of Friends of Fernhill and Mulgoa Valley Inc. by

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